



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

September 29, 2009

William Bardin, Plant Manager
Firestone Building Products Company, LLC
780 James P. Casey Road
Bristol, CT 06010

Re: Clean Air Act Reporting Requirement, Docket No. AAA-09-0022

Dear Mr. Bardin:

The United States Environmental Protection Agency ("EPA") is issuing this Reporting Requirement for the purpose of evaluating whether Firestone Building Products Company, LLC, in Bristol, Connecticut ("Firestone") is in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. The regulations include the federally enforceable provisions of Section 22a-174-3a of the Regulations of Connecticut State Agencies.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Act. Therefore, within **60 days** of the date Firestone receives this Reporting Requirement, Firestone is required to provide all of the information outlined below for the Bristol facility ("Facility") unless otherwise specified. Please provide a separate numbered response to each numbered paragraph or subparagraph below:

1. Provide the following information about Firestone:
 - a. Describe the ownership and business structure;
 - b. Indicate the date and state of incorporation;
 - c. List any partners or corporate officers;
 - d. List any parent and subsidiary corporations;
 - e. Provide the number of employees at the facility;
 - f. Provide the net worth of the company (if not available, provide gross annual receipts since 2003); and
 - g. Provide the date when Firestone began operating at the Facility.

2. Provide copies of all records of monthly volatile organic compound (VOC) emissions at the Facility from the Modified Bitumen Asphalt Roofing Process between January 1, 2004, and June 30, 2009.
3. Provide copies of all records of monthly VOC emissions at the Facility from the manufacturing of foam insulation board (FIB) through the polyisocyanurate process between January 1, 2004, and June 30, 2009. Specifically, provide:
 - a. All logs or receipts of shipments of raw materials received;
 - b. All "Certificates of Analyses" for each lot of raw materials received. If such "Certificates of Analyses" are unavailable, the material safety data sheets (MSDSs) for each lot of raw materials received. Note: the MSDS should be relevant to the time period the raw material was received. If such MSDSs are unavailable, provide all the other data used to determine the VOC content of raw materials received;
 - c. All production records of raw materials used each month;
 - d. All production records that record the monthly amount of finished products;
 - e. A calculation of monthly VOC emissions from FIB production before controls (explain any assumptions). Do not include the warehouse emissions in this calculation;
 - f. A calculation of monthly VOC emissions from the FIB production after controls (explain any assumptions). Do not include the warehouse emissions in this calculation;
 - g. A calculation of monthly VOC emissions from the warehouse (explain any assumptions); and
 - h. All records used to calculate the amount of VOCs that remain in the finished FIB product upon leaving the Facility.
4. For each year from 2004 through 2009, estimate how much of scrap FIB is routed to a dust collector. Include copies of the information used to make this estimate.
5. For each year from 2004 through 2009, estimate the average length of time in days that finished FIB products were stored on-site at the Facility. Include copies of the information used to make this estimate.
6. Provide the following information (and corresponding documentation) about the laminating machines that the Facility currently uses:
 - a. The date each laminating machine was purchased;
 - b. The date each laminating machine was installed;
 - c. The date each laminating machine began operating; and
 - d. The name of the manufacturer, model number, size, production rate, and any other operational specifications.
7. Provide copies of the results of all partial or full emissions tests Firestone has conducted at any of its locations. In addition, provide copies of any other testing

Firestone has used or relied on, to determine the amount of VOCs retained in finished FIB products. Include a detailed description of the testing methodology.

8. Provide a list of all other process equipment (e.g. storage tanks, process vessels, trim, crosscut saws) and process support equipment (e.g. boilers, compressors, and storage tanks, pollution control equipment) costing more than \$10,000 that Firestone installed at the Facility since January 1985. Also, for each piece of equipment, provide the following information (and corresponding documentation):
 - a. The purpose/role of the equipment;
 - b. The date the equipment was purchased;
 - c. The date the equipment installation was completed;
 - d. The date the equipment began operating; and
 - e. The name of the manufacturer, model number, size, maximum production rate, and any other operational specifications.
9. Provide copies of the calculations and the reports that the Facility used to fill out the monthly, 12-month rolling totals and annual emissions reports for the Connecticut Department of Environmental Protection (CT DEP) from 1990 through 2008.
10. Provide copies of all correspondence with state and federal environmental agencies regarding emissions of air pollution from the Facility since 1990, including copies of:
 - a. All permits issued;
 - b. All permit applications; and
 - c. Any requests for permit modifications.

Mail the submissions required by this letter to:

Steven Calder, Enforcement Officer
US EPA Region I
One Congress Street Suite 1100 (SEA)
Boston, Massachusetts 02114

Be aware that if Firestone does not provide the requested information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

Firestone may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Firestone.

If you have any questions regarding this requirement, please contact Enforcement Officer, Steven Calder, at (617) 918-1744, or have your attorney call Senior Enforcement Counsel, Thomas T. Olivier, at (617) 918-1737.

Sincerely,

A handwritten signature in black ink that reads "Susan Studlien". The signature is written in a cursive, flowing style.

Susan Studlien, Director
Office of Environmental Stewardship

cc: Robert Girard, CT DEP